

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FAN ZHANG, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

GROUPON, INC., ANDREW D. MASON,  
JASON E. CHILD, JOSEPH M. DEL PRETO,  
ERIC P. LEFKOFSKY, THEODORE J.  
LEONSI, PETER J. BARRIS, KEVIN J.  
EFRUSY, MELLODY HOBSON, BRADLEY A.  
KEYWELL, HOWARD SCHULTZ, MORGAN  
STANLEY & CO. LLC, GOLDMAN, SACHS &  
CO., CREDIT SUISSE SECURITIES (USA)  
LLC, ALLEN & COMPANY LLC, MERRILL  
LYNCH, PIERCE, FENNER & SMITH  
INCORPORATED, BARCLAYS CAPITAL INC.,  
CITIGROUP GLOBAL MARKETS INC.,  
DEUTSCHE BANK SECURITIES INC., J.P.  
MORGAN SECURITIES LLC, WELLS FARGO  
SECURITIES, LLC, WILLIAM BLAIR &  
COMPANY L.L.C., LOOP CAPITAL  
MARKETS, INC., RBC CAPITAL MARKETS  
LLC and THE WILLIAMS CAPITAL GROUP,  
L.P.,

Defendants.

Case No. 12-cv-02450

Honorable Charles R. Norgle, Sr.

[Caption continued]

**NOTICE OF MOTION OF GUS SEKAS  
FOR CONSOLIDATION, APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF SELECTION OF COUNSEL**

KATHLEEN ROSELLI, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

GROUPON, INC., ERIC P. LEFKOFSKY,  
ANDREW D. MASON, JASON CHILD, KEVIN  
EFRUSY, THEODORE J. LEONSISS, HOWARD  
SCHULTZ, JOSEPH M. DEL PRETO, MORGAN  
STANLEY & CO. LLC, GOLDMAN, SACHS &  
CO., CREDIT SUISSE SECURITIES (USA)  
LLC,

Defendants.

Case No. 12-cv-02460

Honorable Charles R. Norgle, Sr.

DENNIS EINSPAHR, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

GROUPON, INC., JASON E. CHILD, JOSEPH  
M. DEL PRETO, ANDREW D. MASON, ERIC  
P. LEFKOFSKY, PETER J. BARRIS, KEVIN J.  
EFRUSY, MELLODY HOBSON, BRADLEY A.  
KEYWELL, THEODORE J. LEONSISS,  
HOWARD SCHULTZ, MORGAN STANLEY &  
CO. LLC, GOLDMAN, SACHS & CO., CREDIT  
SUISSE SECURITIES (USA) LLC, ALLEN &  
COMPANY LLC, MERRILL LYNCH, PIERCE,  
FENNER & SMITH INCORPORATED,  
BARCLAYS CAPITAL INC., CITIGROUP  
GLOBAL MARKETS INC., DEUTSCHE BANK  
SECURITIES INC., J.P. MORGAN SECURITIES  
LLC, WELLS FARGO SECURITIES, LLC,  
WILLIAM BLAIR & COMPANY LLC., LOOP  
CAPITAL MARKETS, INC., RBC CAPITAL  
MARKETS LLC and THE WILLIAMS CAPITAL  
GROUP, L.P.,

Defendants.

Case No. 12-cv-02547

Honorable Charles R. Norgle, Sr.

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JOHN PEDROW, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

GROUPON, INC., ANDREW D. MASON,  
JASON E. CHILD, JOSEPH M. DEL PRETO,  
ERIC P. LEFKOFSKY, THEODORE J.  
LEONSIS, PETER J. NARRIS, KEVIN J.  
EFRUSY, MELLODY HOBSON, BRADLEY A.  
KEYWELL, HOWARD SCHULTZ, MORGAN  
STANLEY & CO. LLC, GOLDMAN, SACHS &  
CO., CREDIT SUISSE SECURITIES (USA)  
LLC, ALLEN & COMPANY LLC, MERRILL  
LYNCH, PIERCE, FENNER & SMITH  
INCORPORATED, BARCLAYS CAPITAL INC.,  
CITIGROUP GLOBAL MARKETS INC.,  
DEUTSCHE BANK SECURITIES INC., J.P.  
MORGAN SECURITIES LLC, WELLS FARGO  
SECURITIES, LLC, WILLIAM BLAIR &  
COMPANY L.L.C., LOOP CAPITAL  
MARKETS, INC., RBC CAPITAL MARKETS  
LLC and THE WILLIAMS CAPITAL GROUP,  
L.P.,

Defendants.

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JOHN H. COTTRELL, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

GROUPON, INC., ANDREW D. MASON,  
JASON E. CHILD, JOSEPH M. DEL PRETO,  
ERIC P. LEFKOFSKY, THEODORE J.  
LEONSIS, PETER J. NARRIS, KEVIN J.  
EFRUSY, MELLODY HOBSON, BRADLEY A.  
KEYWELL, HOWARD SCHULTZ, MORGAN  
STANLEY & CO. LLC, GOLDMAN, SACHS &  
CO., CREDIT SUISSE SECURITIES (USA)

Case No. 12-cv-02791

Honorable Charles R. Norgle, Sr.

Case No. 12-cv-03129

Honorable Charles R. Norgle, Sr.

LLC, ALLEN & COMPANY LLC, MERRILL  
LYNCH, PIERCE, FENNER & SMITH  
INCORPORATED, BARCLAYS CAPITAL INC.,  
CITIGROUP GLOBAL MARKETS INC.,  
DEUTSCHE BANK SECURITIES INC., J.P.  
MORGAN SECURITIES LLC, WELLS FARGO  
SECURITIES, LLC, WILLIAM BLAIR &  
COMPANY L.L.C., LOOP CAPITAL  
MARKETS, INC., RBC CAPITAL MARKETS  
LLC and THE WILLIAMS CAPITAL GROUP,  
L.P.,

Defendants.

**PLEASE TAKE NOTICE** that on June 8, 2012, at 10:30.m., or as soon thereafter as counsel may be heard, Movant Gus Sekas, by his undersigned counsel, shall appear before the Honorable Charles R. Norgle Sr. or any Judge sitting in his stead, in the Courtroom 2341 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, Illinois 60604, and shall then and there present Motion of Movant Gus Sekas for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Counsel, a copy of which is attached and hereby served upon you.

Dated: June 4, 2012

Respectfully submitted,

s/ Norman Rifkind

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*Attorneys for Gus Sekas and Proposed Lead Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 4, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2012.

*/s/ Norman Rifkind*

Norman Rifkind